

ORIGINAL

David I. Horowitz (DH 0921)
KIRKLAND & ELLIS LLP
777 South Figueroa Street
Los Angeles, CA 90017-5800
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WEEKS MARINE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

BRIDGESTONE CORPORATION,
BRIDGESTONE INDUSTRIAL PRODUCTS
AMERICA, INC., TRELLEBORG
INDUSTRIE S.A., DUNLOP OIL &
MARINE LTD., PARKER ITR S.L.R.,
MANULI RUBBER INDUSTRIES S.P.A.;
MANULI OIL & MARINE (U.S.A.) INC.,
YOKOHAMA RUBBER CO., LTD., PW
CONSULTING INTERNATIONAL LTD.,
PETER WHITTLE, DAVID BRAMMAR,
BRYAN ALLISON, JACQUES COGNARD,
CHRISTIAN CALECA, MISAO HIOKI;
FRANCESCO SCAGLIA and VANNI
SCODEGGIO,

Defendants.

Case No.: 07-CV-06811-AKH

ECF Case

**NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, David I. Horowitz, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: James H. Mutchnik, P.C.
Firm Name: Kirkland & Ellis LLP
Address: 200 E. Randolph Drive
City/State/Zip: Chicago, IL 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

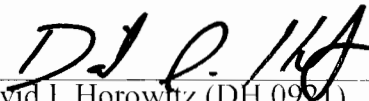
Applicant's Name: Christopher T. Casamassima
Firm Name: Kirkland & Ellis LLP
Address: 777 South Figueroa Street
City/State/Zip: Los Angeles, CA 90017-5800
Phone Number: (213) 680-8400
Fax Number: (213) 680-8500

626214 \$50 8-6-07 mg

James H. Mutchnik, P.C., is a member in good standing of the Bar of the State of Illinois.
Christopher T. Casamassima is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against James H. Mutchnik, P.C., or
Christopher T. Casamassima in any State or Federal court.

Dated: September 4, 2007
Los Angeles, California



David I. Horowitz (DH 0921)

KIRKLAND & ELLIS LLP
777 South Figueroa Street
Los Angeles, CA 90017-5800
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

Attorneys for Defendant Misao Hioki

ORIGINAL

David I. Horowitz (DH 0921)
KIRKLAND & ELLIS LLP
777 South Figueroa Street
Los Angeles, CA 90017-5800
Telephone: (213) 680-8400
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

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BRYAN ALLISON, JACQUES COGNARD,
CHRISTIAN CALECA, MISAO HIOKI;
FRANCESCO SCAGLIA and VANNI
SCODEGGIO,

Defendants.

Case No.: 07-CV-06811-AKH

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**AFFIDAVIT OF DAVID I. HOROWITZ
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

DAVID I. HOROWITZ, being duly sworn, hereby deposes and states:

1. I am a practicing attorney duly admitted to the Bar of the State of New York and admitted to practice before this Court. I am an associate at the firm of Kirkland & Ellis LLP, attorneys for the Defendant Misao Hioki. I submit this affidavit in support of Defendant's motion pursuant to Rule 1.3(c) of this Court's Local Rules for an order permitting James H. Mutchnik, P.C., and Christopher T. Casamassima to appear as counsel *pro hac vice* on behalf of Defendant Hioki for the purposes of this action.

2. Mr. Mutchnik is a partner at the firm of Kirkland & Ellis LLP in Chicago, Illinois. He is a practicing attorney and a member in good standing of the Bar of the State of Illinois

(admitted 11/89, Bar No. 66201681). In addition, he is admitted to practice in the United States District Court for the Northern District of Illinois (admitted 2/6/04). Mr. Mutchnik's affidavit in support of this motion, including a copy of a certificate of good standing certifying his status as a member of the Illinois State Bar, is attached as Exhibit A.

3. Mr. Casamassima is a partner at the firm of Kirkland & Ellis LLP in Los Angeles, California. He is a practicing attorney and a member in good standing of the Bar of the State of California (admitted 11/00, Bar No. 211280). In addition, he is admitted to practice in the United States District Courts for the Northern District of California, the Central District of California, the Eastern District of California and the Southern District of California, as well as the Ninth Circuit Court of Appeals. Mr. Casamassima's affidavit in support of this motion, including a copy of a certificate of good standing certifying his status as a member of the California State Bar, is attached as Exhibit B.

4. There are no pending disciplinary proceedings against either Mr. Mutchnik or Mr. Casamassima in any State or Federal Court.

5. I respectfully submit a proposed order granting the admission of James H. Mutchnik, P.C., and Christopher T. Casamassima, *pro hac vice*, attached hereto as Exhibit C.

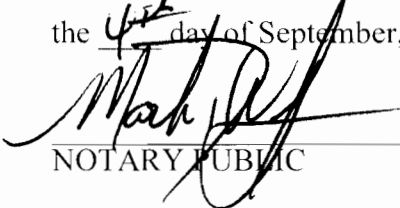
WHEREFORE it is respectfully requested that the motion to admit James H. Mutchnik, P.C., and Christopher T. Casamassima, *pro hac vice*, to represent Defendant Hioki in the above captioned matter, be granted.

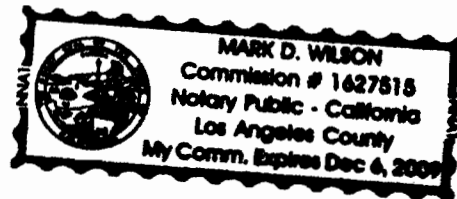
Dated: September 4, 2007
Los Angeles, California

Respectfully submitted,


David I. Horowitz (DH 0921)

Subscribed and sworn to before me
the 4th day of September, 2007


NOTARY PUBLIC



My Commission: 1627515 exp 12/4/09

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WEEKS MARINE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

BRIDGESTONE CORPORATION, *et al.*,

Defendants.

Case No.: 07-CV-06811-(AKH)
ECF Case

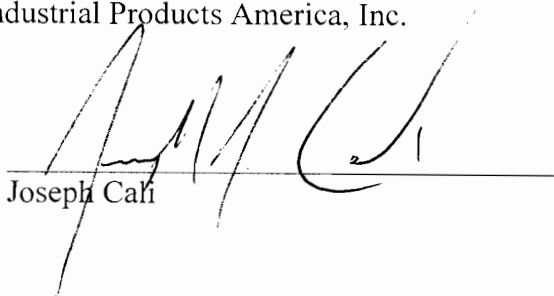
CERTIFICATE OF SERVICE

I, Joseph Cali, the undersigned, certify under penalty of perjury, that on September 6, 2007, I caused a true and correct copy of defendant Misao Hioki's Notice of Motion for Admission *Pro Hac Vice* of James H. Mutchnik, P.C. and Christopher T. Casamassima, Affidavit of David I. Horowitz in Support and Order Admitting Counsel *Pro Hac Vice* was served via first class mail upon the following parties:

Robert G. Eisler
Seth R. Gassman
COHEN, MILSTEIN, HAUSFELD & TOLL, P.L.L.C.
150 East 52nd Street, 13th Floor
New York, NY 10022
Attorney for Weeks Marine, Inc.

Jeffery A. Kimmel
Hal D. Hardin
Harold R. Donnelly
MEISTER SEELIG & FEIN, LLP
140 East 45th Street, 19th Floor
New York, NY 10017
Attorneys for Defendant Bridgestone Industrial Products America, Inc.

Dated: September 6, 2007



Joseph Cali

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WEEKS MARINE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

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BRIDGESTONE CORPORATION, *et al.*,

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Case No.: 07-CV-06811-(AKH)
ECF Case

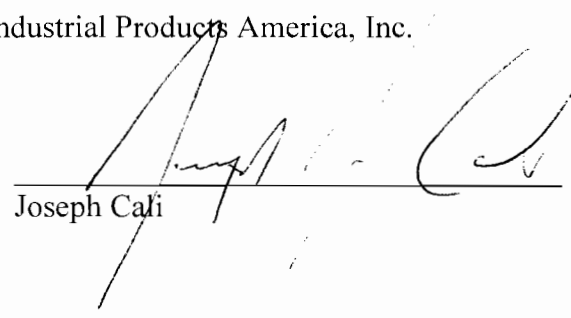
CERTIFICATE OF SERVICE

I, Joseph Cali, the undersigned, certify under penalty of perjury, that on September 6, 2007, I caused a true and correct copy of defendant Misao Hioki's Notice of Motion for Admission *Pro Hac Vice* of James H. Mutchnik, P.C. and Christopher T. Casamassima, Affidavit of David I. Horowitz in Support and Order Admitting Counsel *Pro Hac Vice* to be served via pre-paid first class mail upon the following parties:

Robert G. Eisler
Seth R. Gassman
COHEN, MILSTEIN, HAUSFELD & TOLL, P.L.L.C.
150 East 52nd Street, 13th Floor
New York, NY 10022
Attorneys for Weeks Marine, Inc.

Jeffery A. Kimmel
Hal D. Hardin
Harold R. Donnelly
MEISTER SEELIG & FEIN, LLP
140 East 45th Street, 19th Floor
New York, NY 10017
Attorneys for Defendant Bridgestone Industrial Products America, Inc.

Dated: September 6, 2007



Joseph Cali

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WEEKS MARINE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

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BRIDGESTONE INDUSTRIAL PRODUCTS
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MANULI OIL & MARINE (U.S.A.) INC.,
YOKOHAMA RUBBER CO., LTD., PW
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BRYAN ALLISON, JACQUES COGNARD,
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Defendants.

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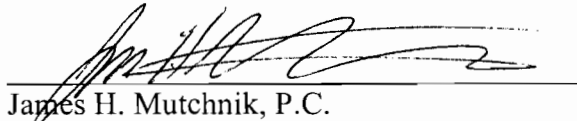
**AFFIDAVIT OF JAMES H. MUTCHNIK,
P.C., IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

I, JAMES H. MUTCHNIK, P.C., file this Affidavit in Support of Motion to Admit
Counsel *Pro Hac Vice*, and hereby state as follows:

1. I am admitted to practice in, and am a member in good standing of the Bar of the State of Illinois. I am also admitted to practice law in the United States District Court for the Northern District of Illinois. A certificate of good standing certifying my status as a member of the Illinois State Bar is attached to this affidavit. If certificates are needed for other courts, I will provide them.
2. There are no pending disciplinary proceedings against me in any State or Federal Court.
3. My office address, telephone number and telecopier number are included below my signature.

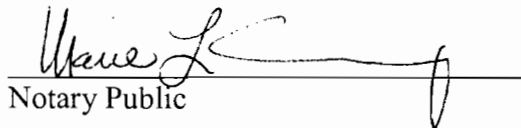
4. I am a partner with Kirkland & Ellis LLP. Kirkland & Ellis LLP has been retained to represent Defendant Misao Hioki.

5. I respectfully request permission to appear in this Court for this cause only.



James H. Mutchnik, P.C.
IL Bar No. 66201681
Kirkland & Ellis LLP
200 E. Randolph Drive
Chicago, IL 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

Subscribed and sworn before me
by James H. Mutchnik, P.C., on
this 5th day of September, 2007.


Notary Public

My Commission: MAY 17, 2010



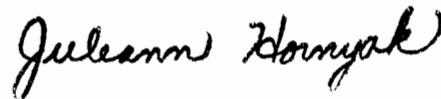
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

James Howard Mutchnik

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 14, 1989 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Tuesday, August 28, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WEEKS MARINE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

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BRIDGESTONE INDUSTRIAL PRODUCTS
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Defendants.

Case No.: 07-CV-06811-AKH

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**AFFIDAVIT OF CHRISTOPHER T.
CASAMASSIMA IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO
HAC VICE***

I, CHRISTOPHER T. CASAMASSIMA, file this Affidavit in Support of Motion to
Admit Counsel *Pro Hac Vice*, and hereby state as follows:

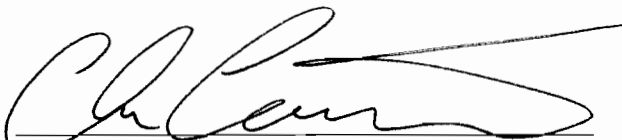
1. I am an active member in good standing of the Bar of the State of California and currently eligible to practice law in the following courts: California state courts, the United States District Courts for the Northern District of California, the Central District of California, the Eastern District of California and the Southern District of California, and the Ninth Circuit Court of Appeals. A certificate of good standing certifying my status as a member of the California State Bar is attached to this affidavit. If certificates are needed for other courts, I will provide them.

2. There are no pending disciplinary proceedings against me in any State or Federal Court.

3. My office address, telephone number and telecopier number are included below my signature.

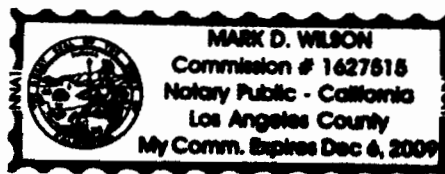
4. I am a partner with Kirkland & Ellis LLP. Kirkland & Ellis LLP has been retained to represent Defendant Misao Hioki.

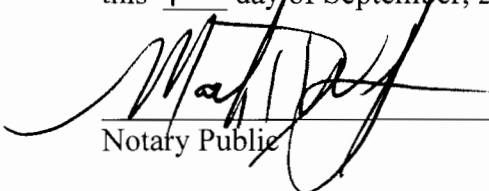
5. I respectfully request permission to appear in this Court for this cause only.



Christopher T. Casamassima
CA State Bar No. 211280
Kirkland & Ellis LLP
777 South Figueroa Street
Los Angeles, CA 90017-5800
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

Subscribed and sworn before me
by Christopher T. Casamassima on
this 4th day of September, 2007.




Notary Public

My Commission: 1627515 EXP 12/6/09



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 29, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, CHRISTOPHER THOMAS CASAMASSIMA, #211280 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 2000; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over the printed name.

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
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SCODEGGIO,

Defendants.

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ECF Case

**ORDER FOR ADMISSION *PRO HAC*
VICE ON WRITTEN MOTION**

Upon the motion of David I. Horowitz, attorney for Defendant Misao Hioki, and said
sponsor attorney's affidavit of support;

IT IS HEREBY ORDERED that

Applicant's Name: James H. Mutchnik, P.C.
Firm Name: Kirkland & Ellis LLP
Address: 200 E. Randolph Drive
City/State/Zip: Chicago, IL 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

Applicant's Name: Christopher T. Casamassima
Firm Name: Kirkland & Ellis LLP
Address: 777 South Figueroa Street
City/State/Zip: Los Angeles, CA 90017-5800
Phone Number: (213) 680-8400
Fax Number: (213) 680-8500

are admitted to practice *pro hac vice* as counsel for Defendant Misao Hioki in the above
captioned case in the United States District Court for the Southern District of New York. All
attorneys appearing before this Court are subject to the Local Rules of this Court, including the
Rules governing discipline of attorneys.

If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: September __, 2007
New York, New York

United States District Judge

